

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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ELLIOTT BROIDY and BROIDY CAPITAL
MANAGEMENT, LLC,

Plaintiffs,

- against -

GLOBAL RISK ADVISORS LLC,
GRA MAVEN LLC,
GRA QUANTUM LLC,
GLOBAL RISK ADVISORS EMEA LIMITED,
GRA RESEARCH LLC,
QRYPT, INC.,
KEVIN CHALKER,
DENIS MANDICH,
ANTONIO GARCIA, and
COURTNEY CHALKER,

Defendants.
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Case No. 19-cv-11861-MKV

**DECLARATION OF ORIN SNYDER IN OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE TO AMEND**

I, Orin Snyder, hereby declare as follows:

1. I am over eighteen years of age and am otherwise competent to make this declaration. The statements contained in this declaration are based upon my personal knowledge. If called upon to testify, I could and would testify competently to the matters discussed herein.

2. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Defendants Global Risk Advisors LLC, GRA Maven LLC, GRA Quantum LLC, Global Risk Advisors EMEA Limited, GRA Research LLC, Qrypt, Inc., Kevin Chalker, Denis Mandich, Antonio Garcia, and Courtney Chalker.

3. Attached hereto as Exhibit A is a true and correct copy of Mr. Chalker's itinerary reflecting flights taken by Mr. Chalker and his family on December 27, 2017 and December 30,

2017. The itinerary has been redacted to protect the privacy of Mr. Chalker's family members.

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was executed on this 13th day of July, 2021, at New York, NY.

/s/ Orin Snyder

Orin Snyder